## HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection	Wy 1,1997	Time start 10:15 cu	Time finish	13:15 pm		
Name of Inspector P. Hondke						
Company, installation	name Staney F	bagg + Co., In	<u> </u>			
Location <u>1020 W</u>	est High Stree	+, Stowe, PA	19464			
County Montgo	mery	Municipality <u>i</u>	west Portsqu	are Tup.		
Identification number	PAD2017378	-				
Name of responsible o	official Gary Lym	YAO				
Title Corporate	Environment	al Engineer				
Mailing Address_\0	20 West High	Street, Stowe	, PA 19464			
	one number 610 135					
Name of person interv	riewed kry stro	<u> </u>				
Title Consultor	•					
Mailing address (if diff	ferent from above) <u>50</u>	me				
Area code and telepho	one number some					
	adlina mathadi					
<ol> <li>Current waste ha a. ☐ On-site</li> </ol>	treatment,	□ storage	☐ disposal	□ PBR		
_	_	□ storage,	□ recycle,	□reclaim		
b. On-site	□ use,	☐ reuse,				
c. □Off-site	_	□ storage, □ reuse,	□ disposal <b>泾</b> (recycle,	⊠reclaim		
d. 🛛 Off-site	□ use,	∐≀euse,	Stechcie,	Micciann		
2. Amount of hazar	rdous waste produced:					
a. <u>Se re</u>	-box+	kg/mo.				
L		kg./yr.				
b				ion facility finclud		
3. Types of hazard location and type						
3. Types of hazard	e).	on Facility	lumber and destinat Location a			
3. Types of hazard location and type	e).	on Facility				
3. Types of hazard location and type  Waste Number	e).  Destination	on Facility	Location a			
3. Types of hazard location and type  Waste Number	Destination  Safety - Kicen C	on Facility  Sorp. PA 19380	Location a			
3. Types of hazard location and type  Waste Number	Destination  Sofety: Kicen C  West Chester  PADOOD13884	on Facility  Sorp. PA 19380	Location a			
3. Types of hazard location and type  Waste Number  D039	Destination  Sofety: Kicen C  West Chester  PADOOD13884	on Facility  Dosp. PA 19380  19 mental Services 5	Location a			
3. Types of hazard location and type  Waste Number  D039	Destination  Sofely: Kleen C  West Chester  PADOODT3884  Philips Environ	on Facility  Dosp. PA 19380  19 mental Services 5	Location a			

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Stankey Flogg + Co. ID Number PADCO1737899 Date Wy 1,1997

### Hazardous Waste Inspection Report Generators - Part B

Generators - Part B 1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance **STATUS** LINE CHAPTER REQUIREMENT **CITATION** ITEM 2 3 4 Hazardous waste determination, performed on all waste streams 262.11 H<sub>00</sub>1 262.12 H002 Identification number Hazardous waste shipments offered only to licensed transporters 262.12(d) H<sub>0</sub>03 Authorization received from TSD facility for wastes shipped off-site within 262.13 H004 262.20(b) H005 PA manifest used for intrastate shipments TSD state manifest or PA manifest used for out-of-state shipments 262.20(c) H006 262.20(a) H007 Manifests filled out properly and completely Manifests routed properly and within time limits (7 days) 262.23(e)(f) **800H** 262.30(1) H009 Proper U.S. DOT shipping containers or packages being used Shipping containers marked and labeled according according to U.S. DOT 262.30(2) H010 Containers of 110 gal. or less permanently marked with required hazardous 262.30(3) H011 waste label 262.33 H012 Placards offered to transporter H013 262.34(a)(1) Waste in containers or tanks accumulated on-site for less than 90 days. 262.34(a)(2) H014 Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J 262.34(a)(3) Containers managed in accordance with Chapter 265, Subchapter I (any non-H<sub>0</sub>15 compliance for Subchapter I requirements is a violation of 262.34(a)(3)) 265.171 H016 a). All containers of haz, waste in good condition Containers compatible with hazardous waste being stored within 265.172 H017 b). Containers of hazardous waste kept closed 265.173(a) H018 c). d). Containers of hazardous waste are managed to prevent leaks 265.173(b) H019 265.173(c) H<sub>0</sub>20 e). Containers of hazardous waste labelled to accurately identify contents 265.174 H021 f). Haz, waste accumulation areas inspected at least weekly g). 265.176 - .177 Special requirements for ignitable, reactive and incompatible waste H022 being met 265.178 H023 Proper containment and collection system(s) Containers clearly marked with accumulation date and visible for inspection H024 262.34(a)(4) 262.34(a)(5) H025 On the job or classroom personnel training program as per 265.16

# Hazardous Waste Inspection Report Generators - Part B 2-Not-Applicable 3-Not-Determined

	_	1-1	No Violation Observed 2-Not-Applicable 3-Not-Determined	4-Non-Compliance	
STATUS 1   2   3   4		4	REQUIREMENT	CHAPTER CITATION	UNE
			Records retained at designated location for 20 years	262.40(a)	H026
X			Quarterly reports submitted to the Department	262.41(a)	H027
			Exception reporting procedures followed	262.42	H028
X	1	Γ	Hazardous waste disposal plan, if required	262.45	H029
	Γ	Γ	Spill reporting procedures followed	262.46(a)	H030
			Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
			Special requirements followed for international shipments	262.50,.53, .55, 60	H032
	T		Source reduction strategy prepared and available	262.80	H033
	2 ×	STATUS 2 3		REQUIREMENT  REQUIREMENT  Records retained at designated location for 20 years  Quarterly reports submitted to the Department  Exception reporting procedures followed  Hazardous waste disposal plan, if required  Spill reporting procedures followed  Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265  Special requirements followed for international shipments	REQUIREMENT  CHAPTER CITATION  Records retained at designated location for 20 years  Quarterly reports submitted to the Department  Exception reporting procedures followed  Exception reporting procedur

ER-WM-129: Rev. 12/93

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

#### INSPECTION REPORT COMMENTS

Date of inspection _July 1, 1997	Identification Number	_PAD001737899
Company/Facility/Site Name_Flagg Brass, Division of Amca	st Industrial	

A hazardous waste generator inspection was conducted on Tuesday, July 1, 1997 by Paul Handke and Christian Kuba, Solid Waste Specialists. Jerry Stick, Consultant, granted access to the site and was the person interviewed during the inspection.

The following observations were made:

- 1) This facility generates two hazardous waste streams; sand and metal grindings and parts cleaner.
- 2) The waste sand and metal grindings (D006, D008) are generated in the 36 foundry 36 cleaning from the cleaning of brass castings. This waste is hazardous for lead and cadmium. The waste is collected at the generation point in hoppers. Each hopper is labeled with a hazardous waste label. The hoppers are staged at the mill dust storage area and are then taken to a roll-off in a storage area. The roll-off is lined and is labeled as containing hazardous waste. An inspection log is kept for the area, indicating when new roll-offs are placed in this area. This waste is transported by John Pfrommer, Inc., license number PA-AH0042, to Phillips Environmental Services Corporation (A100145) in Hamilton, Ontario, Canada for recycling. The notices of intent to export were submitted to both the Department and the Environmental Protection Agency for the calendar year 1997 and the port of departure is noted on each shipment manifest. Flagg Brass generates approximately 4 roll-offs of this waste weighing approximately 38,000 pounds each.
- 3) Waste parts cleaner is also generated. The parts cleaner is transported by Safety Kleen Corporation, license number PA-AH0172, to Safety Kleen Corporation (PAD000738849) in West Chester, Pennsylvania for reclamation. Flagg Brass generates approximately 100 gallons of waste cleaner per quarter, or every 3 months.
  - 4) The PPC Plan and the source reduction strategy are currently being updated for this facility.
- 5) Employee training consists of Hazardous Waste Management Training. One employee attended this training within the last year and trained the fork lift operator who transports the hazardous waste from the mill dust storage area to the hazardous waste roll-off. It was suggested that records be maintained of the internal trainings and to possibly train other employees who might have to become involved with the handling of the hazardous waste if the regular fork lift operator is not available. All employees have hazardous material communication training when hired and attend a yearly refresher. The foundry employees also attend lead training.

No violations were noted on this date. These items were discussed with Mr. Stick and Gary Lyman, Corporate Environmental Engineer, during and after the inspection. A copy of this report was mailed to the facility on the date indicated below.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Person interviewed (signature) Copy muited to facility	Date 7/9/97
Inspector (signature) 15 / Line 15	Date 7/9/97

ER-WM-137: Rev. 8/93

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT HAZARDOUS WASTE PERMIT BY RULE FACILITY

Company, Installation Name Stanky Flagg+Co., Irc Identification Number PADON 737899		
Determination of Applicability Required? (Subchapter I)	Yes <u>×</u> No	N D
Documentation Available?	Yes X No_	
Does facility accept wastes from off-site for treatment in the PBR system?	Yes No X_	
Does facility have an NPDES permit?  If yes, NPDES Permit Number PA 0050903	Yes 🗶 No	N.D
If no, does facility discharge to a sewage treatment system with an NPDES permit? If yes, NPDES Permit Number	Yes No <u>X</u>	N.D
If yes, does system meet all Federal, State and local pretreatment standards?	Yes 🔀 No	N.D
If system does not directly discharge to a POTW or its own NPDES permitted discharge to a POTW or its own NPDES permitt		
Site Name Stonky Flagg + Co., Inc. 10 Number PADOUN	37899 Date 1014	[PP44]

### Hazardous Waste Inspection Report Hazardous Waste Permit by Rule Facility (WWTP)

3-Not-Determined 4-Non-Compliance 2-Not-Applicable 1-No Violation Observed **STATUS** CHAPTER REQUIREMENT CITATION 2 3 4 Facility has applied for or received an EPA Hazardous Waste identification 264.11(a) Number Active portion has 24 hour surveillance 264.14(b)(1) Artificial barrier surrounds active portion 264.14(b)(2) Proper signs are posted 264.14(c) Inspection schedule is retained at facility 264.15(b)(1) Inspections are conducted as per inspection plan 264.15(c) Deterioration and/or malfunctions of equipment corrected as revealed by 264.15(d) inspections Immediate remedial action taken when a hazard is imminent or already ... 264.15(d) present

### Hazardous Waste Inspection Report Hazardous Waste Permit by Rule Facility (WWTP)

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance STATUS CHAPTER REQUIREMENT CITATION 3 4 2 Inspection log is maintained and utilized properly 264.15(e) Personnel training plan approved by DER and implemented 264.16(a) Personnel documents and records maintained at the facility 264.16(f) Facility is equipped with internal alarm system capable of providing 264.32(1) immediate emergency instruction to personnel Facility is capable of summoning outside emergency assistance 264.32(2) Facility is equipped with spill and decontamination control equipment is 264.32(3) periodically tested and maintained Facility communications and/or alarm systems, and spill and 264.33 decontamination control equipment is periodically tested and maintained Adequate aisle space is maintained to allow unrestricted access for personnel 264.35 and emergency equipment Current PPC plan, prepared and implemented in accordance with Depart-264.52(b) ment's guidelines Copy available at site. Designated primary emergency coordinator and is on-site or on call at all 264.55 times Operating records are maintained at the facility. 264.73(a) Operating record contains description and quantities of wastes treated and 264.73(b)(1) discharged under PBR performed under 264.13, 264.17 and Subchapter O Operating record contains results of waste analyses and trial tests 264.73(b)(3) Operating record contains summary reports and details of any incidents 264.73(b)(4) requiring implementation of PPC plan Operating record contains results of all on-site inspections, including those 264.73(b)(5) outlined in 264.15 Emissions, discharges, fires, explosions and groundwater contamination 264.77(1) reported as required Quarterly report of waste treated under PBR submitted to the Department 264.77(b) Special precautions are taken for ignitable, reactive or incompatible wastes 265.17(b) 265.401(a) Treatment process or equipment compatible with waste and treatment 265.401(b) agents Waste analyses and trial treatment tests conducted when required 265.402(1) Continuously fed equipment is fitted with a means of stopping inflow 265.401(c) Daily inspection of discharge control and safety equipment 265.403(1) Weekly inspection of process equipment and discharge confinement 265.403(3),(4) structures

ER-WM-129: Rev. 12/93

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

#### INSPECTION REPORT COMMENTS

Date of inspection _July 1, 1997 Identification Number _PAD001737899 Company/Facility/Site Name_Flagg Brass, Division of Amcast Industrial
A hazardous waste permit by rule wastewater treatment unit inspection was conducted on Tuesday, July 1, 1997 by Paul Handke and Christian Kuba, Solid Waste Specialists. Jerry Stick, Consultant, granted access to the site and was the person interviewed during the inspection.  The following observations were made:
1) This facility no longer accepts hazardous waste for treatment. A letter to the Department was submitted by Flagg Brass, on January 2, 1997, notifying that this facility no longer accepts hazardous waste for treatment. (see attached)
2) On this date surface water from the galvanizing lagoons was being pumped and treated, in preparation for the closure of the lagoons. Surface water which was formally treated at this facility is now being directly discharged under a storm water discharge permit.
No violations were noted on this date. These items were discussed with Mr. Stick and Gary Lyman, Corporate Environmental Engineer, during and after the inspection. A copy of this report was mailed to the facility on the date indicated below.
•
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

Person interviewed (signature) copy marked to facility

Date 7/8/97

Date 7/8/97

imply immunity from legal action for any violation noted herein.

person was shown the report or that a copy was left with the person.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the

Page <u>3</u> of <u>3</u>





Pennsylvania Department of Environmental Protection Bureau of Waste Management P.O. Box 2063 Harrisburg, PA 17120

January 2, 1997

Certified Mail Z 123 985 885

Dear Sirs,

Enclosed is a revised EPA Form 8700-12 for this facility. Please note the name change from Stanley G. Flagg Brass. You will also note that this facility no longer request PBR status.

I believe the remainder of the form is self explanatory but should I be of further assistance, please feel free to contact me at this location.

Respectfully

Gary J. Lyman

Corporate Environmental Engineer

cc; John Kasarda, PADEP Southeast Region

SUPPLEMENT TO U.S. EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY FORM (EPA Form \$700-12)					
ı.	Installation's EPA I.D. Number FADCO1737879				
11.	Name of Installation Flagy 6.	455 I	ис		
m.	Location of Installation				
	West Petts grove  Municipality (Yownship, Borough, City)		Montgomery county		
ıv.	IRS Employer Identification Number 3	<b>–</b>	58080		
	SIC Codes (four-digit number in order of pri 3369 Specify: Non Ferrows Four except AL + Co		Specify:Specify:		
VI.	Type of Hazardous Wasta Activity				
		7. Permit	Recycle, Reclaim by Rule  Waste H <sub>2</sub> O Treatment Elementary Neutralization Reclamation (see Instructions)		
	ם	8. Transp	porter		
VII. E	Existing Environmental Permits				
(	A. NPOES (Discharges to Surface Water)  PAOO50903	(	D. PSD (Air Emissions from Proposed Sources)		
[	L UIC (Underground Injection of Fluids)	. [	E. Municipal Waste (As defined in Act 97)		
[	C. RCRA (Hazardous Watte)	ſ	F. Residual Waste		

L WOLD LEG V	
UIC (Underground Injection of Fluids)	E. Municipal Waste (As defined in Act 97)
C. RCRA (Hazardous Waste)	F. Residual Waste
	300852
G. Permit by Rule Name of POTW	Borough of Pottstown

### HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection 18 SEPT 96 Time start 1030 hrs. Time finish 1230 hrs.							
Name of Inspector JOHN VASARIA							
Company installation	name FLAGG	22A98					
Location 1020	W. HIGH STR	1012 177	NE PA 1946	4			
County Mach	m=0V	Municipalitu	LI PATTERA	JUA TWI			
County MONTHOMERY Municipality W. POTTS6ROVE TWI							
Name of responsible official GARY LYMAN  Title CORPORATE ENVIRWMENTAL ENGINEER							
			NOWEEK				
Mailing Address	SAME AS A	1K DV E	/× 12001				
	ne number 610 -		(X128 1)				
Name of person interview	ewed Jerry ST	ice					
Title							
Mailing address (if diffe	erent from above)	SAME					
Area code and telephor	ne number	SAME					
Current waste han	dling method:						
a. 🗌 On-site	☐ treatment,	storage,	disposal	□ PBR			
b. 🗆 On-site	use,	reuse,	☐ recycle,	☐ reclaim			
c. Off-site	<u> </u>	storage,	disposal				
d. Off-site	use,	reuse,	∵ recycle,	reclaim			
•			^	, .			
a	lous waste produced:	pour					
	50	kg./mo.					
b		kg./yr.					
• •	us waste produced by	Hazardous Waste	Number and destinati	on facility (include			
location and type)	•						
Waste Number	Destination	Facility	Location as	nd Type			
DOOP	Phillip Environn	ment Al	BUTARD COUNTED	; leclam			
DOUG	PHINO SOURCOM	25/12	"				
DOOF . DOOR	REPUBLIC Environme		HATTELD PA;	TREATMENT			
D039	SAFETY KLEEN		W. CHESTER M	, RECYCLE			
	1.						
4. Source Reduction:	accomplished, <b>M</b> pro	oposed, 🗌 not proj	posed				

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name FLAGG BRASS ID Number	PAD 001737839 Date	18 SEPT 96
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### Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed 4-Non-Compliance 2-Not-Applicable 3-Not-Determined **STATUS** CHAPTER LINE REQUIREMENT 2 3 4 CITATION ITEM Hazardous waste determination, performed on all waste streams 262 11 H001 Identification number 262.12 H002 H003, Hazardous waste shipments offered only to licensed transporters 262.12(d) 262.13 H004 Authorization received from TSD facility for wastes shipped off-site within PA manifest used for intrastate shipments 262.20(b) H005 262.20(c) H006 TSD state manifest or PA manifest used for out-of-state shipments 262.20(g) H007 Manifests filled out properly and completely Manifests routed properly and within time limits (7 days) 262.23(e)(f) **800H** H009 Proper U.S. DOT shipping containers or packages being used 262.30(1) Shipping containers marked and labeled according according to U.S. DOT 262.30(2) H010 H011 262.30(3) Containers of 110 gal. or less permanently marked with required hazardous waste label Placards offered to transporter 262.33 H012 H0134 Waste in containers or tanks accumulated on-site for less than 90 days 262.34(a)(1) H014 Wastes placed in containers properly marked and labeled or in tanks 262.34(a)(2) meeting requirements of Chapter 265, Subchapter J 262.34(a)(3) H015 Containers managed in accordance with Chapter 265, Subchapter I (any noncompliance for Subchapter I requirements is a violation of 262.34(a)(3)) H016 265.171 a). All containers of haz, waste in good condition 265.172 H017 **b**). Containers compatible with hazardous waste being stored within H018 c). 265.173(a) Containers of hazardous waste kept closed H019 265.173(b) d). Containers of hazardous waste are managed to prevent leaks H<sub>0</sub>20 e). Containers of hazardous waste labelled to accurately identify contents 265.173(c) f). 265,174 H021 Haz, waste accumulation areas inspected at least weekly Special requirements for ignitable, reactive and incompatible waste 265.176 - .177 H022 **g**). being met 265,178 H023 h). Proper containment and collection system(s) Containers clearly marked with accumulation date and visible for inspection 262.34(a)(4) H024

On the job or classroom personnel training program as per 265-16

H025

262.34(a)(5)

# Hazardous Waste Inspection Report Generators - Part B 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

			1 -	No Violation Observed 2-Not-Applicable 3-Not-Determined 4	4-Non-Compliance	
•	STATUS		TUS REQUIREMENT		CHAPTER	LINE
1	2	3	4		CITATION	ITEM
X				Records retained at designated location for 20 years	262.40(a)	н026
	X			Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
		X		Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
X				Special requirements followed for international shipments	262.50,.53, .55, .60	н032
N				Source reduction strategy prepared and available	262.80	н033

- 2 -

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Inspector (signature)

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

#### INSPECTION REPORT COMMENTS

Date of inspection 27 September 1996	Identification Number_PAD001737899
Company/Facility/Site Name Flagg Brass	
A hazardous waste large quantity generator inspec 1996 by John Kasarda, Waste Management Specialist, wit Stick and Conrad Heinbach were present for Flagg Brass.	tion of Flagg Brass was conducted on 27 September h the Department of Environmental Protection. Jerry
The following observations were made:	
1. Mr. Stick went through the system where the hazardou placed into the hazardous waste roll-off container.	s waste is taken from the manufacturing area and
2. The accumulation area is inspected by Mr. Stick on a d Mr. Stick at least once a week. The gangway leading to thoff.	
3. The hazardous waste baghouses are emptied as needed weight. The baghouse dust is taken to Republic Environment	
4. Safety-Kleen Corporation, located in West Chester, reconaphtha).	ceives the waste combustible liquids (petroleum
5. The hazardous waste roll-off is transported off-site by and taken to Phillip Environmental Services Corporation is	
6. The manifests were reviewed and found to be in proper	order.
The results of the inspection were discussed with No violations observed.	Mr. Stick and Mr. Heinbach before leaving the facility.
any violations observed during the inspection. Additional notification of violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of timmunity from legal action for any violation noted herein.	ted by a representative of the Department. This report is formal notification of s may be issued concerning either violations noted herein, or other violations the Department. Nothing contained herein shall be deemed to grant or imply the mence with the findings on this report, but does acknowledge that the person
Person interviewed (signature) Copy mailed to facility	Date COCT 9

Date

ER-WM-300: Rev. 11/93 Part A

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

### HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection   1	1/16/95 T	ime start	Time finish	
Name of Inspector B				
	name_FLAG6 B	PACC		
Lassian 1070 M	Harry CT	STAILS PA	194104 (10	10)271 -980
Location 1020 W	. H16H ST .	510WZ, IF	11969 (6	10)526 900
∡ ز	mery	_	W. Pottsgro	ne Int
_	MAD 0017378			
	fficial Gary Ly			
Title CORP. ZA	IVIRON MENTAL	- ENGINE	ER	
Mailing Address	5AME			
Area code and telepho	ne numberA_S_	ABOVS	E	
Name of person intervi	ewed Jerry	Stick		<u> </u>
Title ENVIRON	mental Tec	hNICIAN		
Mailing address (if diffe	erent from above)			
Area code and telepho	ne number	Ame As	Apove	
	all'a a constant			
1. Current waste har		<b></b> .		
a. 🖰 On-site	☐ treatment,	storage,	disposal	□ PBR
b. On-site	use,	☐ reuse,	recycle,	☐ reclaim
c. 🛛 Off-site	<b>⊠</b> treatment,	☐ storage,	<b>⊠</b> disposal	
d. 🙎 Off-site	☑ use,	🔀 reuse,	🔀 recycle,	🔀 reclaim
2. Amount of hazard	lous waste produced:			
a	•	kg./mo.		
	12,000			
	•			
<ol> <li>Types of hazardo location and type)</li> </ol>	ous waste produced by	Hazardous Waste	Number and destination	on facility (include
Waste Number	Destination	Facility	Location an	d Type
Doole Doog	Phillip ENV. S	ervices	Hamilton (	ONTARIO
DO01 DOD8	Republic ENU	1. S. ctems	HATFIELD PA	
0007 -000	THE PROPERTY	7 39 373.5	TWO FICE OF T	

Source Reduction: ☐ accomplished, ☑ proposed, ☐ not proposed

B1011

\* ER-WM-300: Rev. 11/93 Part 8

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name	FLAGE	BRASS	10 Number (POD 001737899	Date	)1	16	195
			CARDON I STORY				

#### Hazardous Waste Inspection Report Generators - Part B

	STA	ATU:	CHAPTER	LINE		
1	2	3	4	REQUIREMENT	CITATION	ITEM
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
×				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X			Π	PA manifest used for intrastate shipments	262.20(b)	H005
×			Г	TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	ноо8
×				Proper U.S. DOT shipping containers or packages being used	262.30(1)	н009
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
×				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
			×	Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H01€
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H02
×				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176177	H022
X				h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265-16	262.34(a)(5)	H025

#### Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance **STATUS** LINE CHAPTER REQUIREMENT CITATION ITEM 2 3 H026 Records retained at designated location for 20 years 262.40(a) H027 Quarterly reports submitted to the Department 262.41(a) Exception reporting procedures followed 262.42 H028 H029 262.45 Hazardous waste disposal plan, if required H030 262.46(a) Spill reporting procedures followed Preparedness, Prevention and Contingency Plan developed and 262.46(e) H031 implemented in accordance with Chapters 264 and 265 262.50,.53, H032 Special requirements followed for international shipments .55, .60 Source reduction strategy prepared and available 262.80 H033

ER-WM-302: Rev. 12/88 Part A

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

#### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Da	te of Inspection $\underline{J}$	11695 Time	e start	Time finish	
Na	me of Inspector 🧘	BILL MILLER			
Cor	mpany, installation	n name FLAGG B	RASS		
Loc	ation 1020 V	V. HIGH ST. S	TOW E	PA 19464 (	010) 326-9000
Cot	unty Monta	omery	Municipalit	w West Pottsura	ve Two
lde	ntification numbe	PAD 001737	_	J	¥
Nar	me of responsible o	official GARY LU	man		
Title	e CORP.	ENVIRONMEN	AL SI	ic.	
Mai	iling Address	SAME			
	a code and teleph		HISO	J &	
Nan	me of person interv	viewed Jerry St	ick		
Title	e ENVIR	ONMENTAL TEC	HNICI	AN	
Mai	ling address (if dif	ferent from above)	A SAL	S ABOUE	
Are	a code and telepho	one number	rre Tra	5 TIBOUE	
1.	Site characteriza	tion:			
	a. 🗌 Treatment -	· □ surface impoundments	☐ chemical	□ physical	□ biological
	b. 🔀 Storage -	☐ containers	<b>⊠</b> tanks	☐ surface impoundments	<b>⊠</b> waste piles
	c. 🔲 Disposal -	☐ land treatment	□landfill	☐incineration	☐ thermal treatment
	d. 🗌 Use	□ reuse	□ recycle	☐ reclaim	
2.	Does the facility	generate hazardous waste?	⊠ Yes □	No	
3.	Types of hazardo	us waste produced by Hazard	dous Waste Nu	mber:	
	Door Doo	8 D006			
4.	Are hazardous wa	astes transported off-site by t	the facility?	☐ Yes  전 No	

Bg 4 of 11

## HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name	FLAG6	BRASS	ID Number	PAD 0017378	39 Date	11/16	95
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### Hazardous Waste Inspection Report TSD Facilities - Part B

4-Non-Compliance 1-No Violation Observed 2-Not-Applicable 3-Not-Determined **STATUS** LINE CHAPTER REQUIREMENT NUMBERS CITATION 2 3 4 H200 265.1(b) Part A permit application submitted 265.431(a) H201 Identification number 265.11 H202 Wastes accepted at facility transported by haulers licensed by DER to 265.11(a) transport hazardous waste H203 Waste streams not covered by permit approved by DER before 265.13(a) acceptance H204 Chemical and physical analysis repeated as required 265.13(a)(1-3) H205 265.13(b) All waste shipments inspected and analyzed when necessary H206 Waste analysis plan on-site 265.13(c) 265.14(b)(1) H207 24 hr. surveillance at active portion H208 Artificial barrier around active portion 265.14(b)(2) H209 Proper signs posted at each entrance, minimum 4 inch lettering 265.14(c) 265.15(b)(1) H210 Facility inspection schedule on-site 265.15(d) H211 Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction H212 Immediate remedial action taken where a hazard is imminent or has 265.15(d) already occurred 265.16 H213 Approved on the job or classroom personnel training program implemented 265.16(f);(q) H214 Records retained for each employee at facility of training, job title, and job description Ignitable or reactive wastes separated from source of ignition or 265.17(a) H215 H216 No smoking signs displayed where there are hazards from ignitable 265.17(a) or reactive wastes H217 Treatment, storage, disposal of ignitable or reactive wastes or mixing 265.17(b) of incompatible wastes or materials conducted according to requirements 265.31 H218 Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents

### Hazardous Waste Inspection Report TSD Facilities - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance **STATUS** CHAPTER LINE REQUIREMENT CITATION NUMBERS 2 3 4 Facility equipped with internal alarm capable of providing H219 265.32(1) immediate emergency instruction to personnel H220 Device for summoning outside emergency assistance available at 265.32(2) scene of operations H221 Facility equipped with fire control, spill control, and 265.32(3) decontamination equipment H222 Facility equipped with water at adequate volume and pressure to 265.32(4) supply fire control equipment Facility communications or alarm systems, fire control, spill control, 265.33 H223 and decontamination equipment tested and maintained H224 Adequate aisle space maintained to allow unobstructed movement 265.35 of personnel and equipment during emergencies H225 Contingency plan onsite and implemented 265.51(a) H226 265.52(a) Contingency plan describes action taken by personnel in the event of an emergency H227 Contingency plan describes arrangements agreed to for outside 265.52(c) emergency services such as police and fire department, hospitals, contractors, etc. H228 Contingency plan contains an up-to-date list of names, addresses and 265.52(d) phone numbers of all persons qualified to act as emergency coordinator Contingency plan contains list of emergency equipment including 265.52(e) H229 location, physical description and capabilities of each item H230 Contingency plan contains an evacuation plan if there is a possibility 265.52(f) that evacuation could be necessary Emergency coordinator designated and on the premises or on call 265.55 H231 H232 Facility accepting only PA manifests 265.71(a) H233 Manifest properly completed and routed within time limits 265.71(b)(c) H234 Manifest discrepancies resolved or reported within time limits 265.72(b) Written operating record maintained on the premises 265.73(a). H235 Written operating record contains description and quantity of H236 265.73(b)(1) wastes and method of treatment, storage or disposal Written operating record contains location and quantity of each H237 265.73(b)(2) hazardous waste Written operating record contains results of waste analyses and H238 265.73(b)(3) treatability tests H239 Written operating record contains reports and details of all incidents 265.73(b)(4) H240 Written operating record contains records and results of all 265.73(b)(5) inspections Written operating record contains required monitoring, testing, and H241 265.73(b)(6) analytical data

### Hazardous Waste Inspection Report TSD Facilities - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

	STA	TUS	,		CHAPTER	LINE
1	2	3	4	REQUIREMENT	CITATION	NUMBERS
	×			Written operating record contains closure and post-closure cost estimates	265.73(b)(7)	H242
X				All records retained on premises and available for inspection	265.74(a)	H243
X				Quarterly reports submitted to DER	265.75(a)	H244
X				Emissions, discharges, fires, explosions, and groundwater contamination reported as required	265.77(a)	H245
X				Groundwater monitoring wells located at approved sites	265.90(b)	H246
X				Approved groundwater sampling and analysis plan developed and implemented	265.92(a)	H247
X				Adequate protection for groundwater monitoring wells	265.92(d)	H248
X				Groundwater quality assessment and abatement outline on the premises	265.93(a)	H249
	X			Closure plan on the premises and up-to-date	265.112(a)	H250
	X			Post-closure plan on the premises and up-to-date	265.118(a)	H251
	X			Annual closure cost estimate on the premises and up-to-date	265.142(a)	H252
	X			Annual post-closure cost estimate on the premises and up-to-date	265.144(a)	H253

Part A

#### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - STORAGE (TANKS) - PART A

Site Name STANLEY FLAGE ID Number PAD 001737899

1-No Violation Observed 2-Not-Applicable

3-Not-Determined

4-Non-Compliance

Γ	STA	ATU:	S	DECLUDENCATA	CHAPTER	LINE
1	2	3	4	REQUIREMENT	CITATION	NUMBERS
			X	Existing tank system without secondary containment certified by Jan. 17, 1994	264.191(a)	H331
	X			Tanks placed in service after Jan. 17, 1993 certified as required	264.192(a)	H332
			X	Secondary containment provided for tanks as required	264.193(a)	H333
			X	Secondary containment systems designed, installed and operated to meet the requirements	264.193(b-f)	Н334
			X	Secondary containment variance approved by DER if not complying with 265.193(a-f)	264.193(g-h)	Н335
			X	Tanks managed to prevent leaks, ruptures, corrosion or failing	264.194(a)	Н336
$\times$				Appropriate controls or practices used to prevent spills and overflows from tank(s) or secondary containment	264.194(b)	Н337
	X			Overfill/spill control equipment inspected per schedule	264.194(d)	Н338
$\overline{X}$				Tanks labelled to accurately identify contents	264.194(n)	H339
X				Required inspections conducted at least once each operating day	264.195(a)	H340
X				Aboveground portions of tank system inspected	264.195(a)(1)	H341
	X			Data from monitoring & leak detection equipment checked	264.195(a)(2)	H342
X				Construction materials and area immediately surrounding tank system inspected.	264.195(a)(3)	H343
	X			Cathodic protection systems, if present, being inspected as required	264.195(b)	H344
X				Inspections being documented in operating record of facility	264.195(c)	H345
X				Tank or secondary containment system, that has leaked or has a spill, removed immediately from service	264.196	H346

#### **HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - WASTE PILES PART B**

Site Name STANLEY FLAGG ID Number PAD 001737 899 Date 11 16 95

1-No Violation Observed

2-Not-Applicable

3-Not-Determined 4-Non-Compliance

	STA	TUS	;		CHAPTER	LINE	
1	2	3	4	REQUIREMENT	CITATION	NUMBER	
	X		Waste piles managed as disposal facility if hazardous waste is stored for longer than one year		265.250	H381	
X				Waste piles managed to prevent wind dispersal of materials	265.251.	H382	
	X			Incoming waste shipments sampled and analyzed before adding to the waste pile if the wastes are amenable to piling and the waste is compatible with the pile.	265.252(a).	H383	
`	X			Waste analysis differentiates between types of hazardous waste placed in the pile so that mixing does not inadvertently occur. Waste analysis includes a visual comparison of color and texture	265.252(b)	H384	
<b>(</b>				Waste piles placed on an impermeable base that is compatible with the waste	265.253(a)(1)(i)	H385	
				Run-on diverted away from waste piles	265.253(a)(1)(ii)	H386	
(				Leachate and run-off collected and managed as a hazardous waste	265.253(a)(1)(iii)	H387	
				Waste piles protected from precipitation	265.253(a)(2)	H388	
				No liquids or wastes containing free liquids placed in the pile	265.253(a)(3)	Н <b>389</b>	
				Precautions taken for handling ignitable, reactive or incompatible wastes or materials	265.256	Н390	
\	1			Incompatible wastes separated or protected from other wastes or materials	265.257(a-b)	Н391	
	X			Decontamination procedures followed when wastes are to be stored in an area where incompatible wastes or materials were previously piled.	265.257(c)	Н392	

#### Bureau of Waste Management

### Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

				o Violation Observed 2-Not Applicable 3-Not Determined 4-Non-	Compliance				
•	Sta		T.	REQUIREMENT	Ctation 40 CFR Part 268				
1	2	3	4						
		<u> </u>	-	Generators	<b></b>				
X		L		Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)				
X				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)				
				Dilution not used as a substitute for treatment.	3				
/				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5).(a)(				
				Storage Facilities					
X				Facility verifies generators classification of waste in accordence with waste analysis plan.	25 Pa Code 265.13(c)				
1				Containers marked to identify contents and accumulation date.	50(a)(2)				
1				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)				
				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)				
				Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)				
				Treatment Facilities, Including PBR and RRR Facilities					
	X			Dilution not used as a substitute for treatment.	3				
	K			Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)				
;	X			Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5) (b)(6)				
	$\prod$			Land Disposal Facilities					
];	X			Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)				
1	K			Facility land disposes of restricted waste only if it meets applicable treatment standard.	40				
15	7		Ti	Facility retains copies of generator notifications and certifications.	7(c)(1)				

Pg 10 of 11

#### **INSPECTION REPORT COMMENTS**

	Date of Inspection	11/16/95	Identification	Number <u>PA [</u>	0001737899
at this faishty in Conjunction with the residual bottore landfull inspection.  All areas of collection and storage large examined. The harpeture waste storage and that has been an origing confers to the patients and possible inspection and further regotiations and possible inspection.  Application will be addressed at a future a longer that was overflowing horizontal that was overflowing horizontal that was overflowing horizontal that the person responsibility for doing all the moves harvestory the plant of any any spillage and disperse of it property and the spillage and disperse of it property to never a wasted.  This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations bestered during the inspection. Additional notification of working to the person of the violations of the department of the Department. This report is formal notification of any violations bestered during the inspection. Additional notification of working contained herein shall be deemed to grain or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.  Person interviewed (signature) further that the person interviewed (signature) further further than the person was shown the report or that a copy was left with the person.  Inspector (signature) further further than the person of the person interviewed (signature) further further person.	Company/Facility/Site	Name FLAGG BRASS	5, W. Pot	togrove	Two.
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Person interviewed (signature)  This inspection report is notice of the findings of an inspection. Conducted by a representative of the Department. This report is formal notification of any violations not be recorded to the conductive of the Department. This report is formal notification of any violations who the conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations of one constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was thought that the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was thought that the person interviewed (signature)  Ferson interviewed (signature)  Ferson interviewed (signature)  First person interviewed (signature)	at this I	acility in Con	sunctio	n with	the
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Person interviewed (signature)    State   Date   1/16/95     Inspector (signature)   Date   1/1/16/95     Inspector (signature)   Date	deemed to grant or imply in	nmunity from legal action for any violation	on noted herein.		
Inspector (signature) William St. Shiroshy Date 11/16/95				and the infolings	on this report, but does
Inspector (signature) William St. Shiroshy Date 11/16/95	Person interviewed (si	gnature) denne Man	20	Date /	1/16/95
Page 11 at 11	Inspector (signature)	William The	cal p		16/95
Pane () At ()			"		Page

Ex-WM-300: Rev. 11/93

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

### HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection	5/17/95	Time start	Time finish _	
Name of Inspector <u>(</u>	in Miller			
Company, installation		BRASS		
Location 1020 W.	HIGH St.	STOWE, PA	19464	
County Mextage	KETY	Municipality	West Potts gro	wetup
Identification number			V	·
Name of responsible of	fficial GARY L	-y MAN		
Title ENVIRON				
Mailing Address			1 BOUE	
Area code and telepho	ne number $\overset{>}{\sim}$	me 45	F100 V -	
Name of person intervi	ewed JERRY	Stick		
Name of person intervi	NMENTAL TO	ECHNICIAN		
Mailing address (if diffe		•	BOVE	
Area code and telephor				
4 C	- 412 4		,	
1. Current waste har	_		المسامة المسامة	C 200
a. 风On-site	☐ treatment,	☐ storage,	disposal	□ PBR
b. On-site	use,	□ reuse,	recycle,	☐ reclaim
•	⊠ treatment,	☐ storage, —	disposal	
d. ∠⊠ Off-site	☐ use,	reuse,	,⊠ recycle,	<b>⊠</b> reclaim
2. Amount of hazard	lous waste produced:		14 - L	
a	> 1,000	kg./mo.		
b	> 12,000	kg./yr.		
3. Types of hazardo location and type)		y Hazardous Waste I	Number and destinatio	n facility (include
Waste Number	I	on Facility	Location an	d Type
Dan Dece	Phillip Envare	nimental scrvices	Hamilton, Cat.	<u> </u>
Doo 1 Do39	Safety KLO	(e)	West Chester.	PA TSD
	P		•	
Republic	Republic E	nv Systems:	HATFIELL, PA	TSD
		,	, , , , , , , , , , , , , , , , , , , ,	

Source Reduction: ☐ accomplished, ☑ proposed, ☐ not proposed

ER-WM-300: Rev. 11/93

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name	FLAGE	BRASS	ID Number	PAD CC1737899	Date	5/17	95
3110 1101110			10 110				

#### Hazardous Waste Inspection Report Generators - Part B

	STA	CHAPTER CITATION			
1	2	3	4	REQUIREMENT	CHAPTER GIATION
×				Hazardous waste determination, performed on all waste streams	262.11
X				Identification number	262.12
×				Hazardous waste shipments offered only to lice used transporters	262.12(d)
×				Authorization received from TSD facility for wastes shipped off-site within PA	262.13
$\times$				PA manifest used for intrastate shipments	262.20(b)
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)
×				Manifests filled out properly and completely	262.20(g)
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)
X				Placards offered to transporter	262.33
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)
		X		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)
X				a). All containers of haz. waste in good condition	265.171
$\times$				b). Containers compatible with hazardous waste being stored within	265.172
$\langle$				c). Containers of hazardous waste kept closed	265.173(a)
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)
<u> </u>				f). Haz. waste accumulation areas inspected at least weekly	265.174
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176177
		X		h). Proper containment and collection system(s)	265.178
		X	1	Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)
XT		$\Box$		On the job or classroom personnel training program as per 265.16	262.34(a)(5)

### Hazardous Waste Inspection Report Generators - Part B

4-Non-Compliance 2-Not-Applicable 3-Not-Determined 1-No Violation Observed **STATUS CHAPTER CITATION** REQUIREMENT 2 3 4 262.40(a) Records retained at designated location for 20 years 262.41(a) Quarterly reports submitted to the Department 262.42 **Exception reporting procedures followed** 262.45 Hazardous waste disposal plan, if required 262.46(a) Spill reporting procedures followed 262.46(e) Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265 262.50,.53,.55,.60 Special requirements followed for international shipments 262.80 Source reduction strategy prepared and available by January 7, 1994

#### Pennsylvania Department of Environmental Resources Bureau of Waste Management

#### Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

			1-N	Violation Observed 2-Not Applicable 3-Not Determined 4-Non-C	Compliance
Status				REQUIREMENT	
1 2 3 4			4	REQUIREMENT	40 CFR Part 268
				Generators	
X		T		Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
Х				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)
X				Dilution not used as a substitute for treatment.	3
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)
				Storage Facilities	
	1			Facility verifies generators classification of waste in accordence with waste analysis plan.	25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.	50(a)(2)
1				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)
	П			Treatment Facilities, Including PBR and RRR Facilities	
	X			Dilution not used as a substitute for treatment.	3
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)
				Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)
	П			Land Disposal Facilities	
1	П			Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.	40
T	1			Facility retains copies of generator notifications and certifications.	7(c)(1)

495

#### **INSPECTION REPORT COMMENTS**

Date of Inspection 5/17/95	Identification Number PAD 001 737 899
Company/Facility/Site Name FLAGE BRASS S	
at this large quantity of and fines that are haza and flammable solventwinste throughout the plant. Jens technician granted permiss evaluation and accompanion Except for the hazardous that Flaga avers is a "Those applicable the facility appears to be hazardous waste regulating the time of my Tule inspecting this aread both	generator of waste dust show for low and Calmium generated by parts washer y Stick site environmenta for to perform the waste Storage area 'ank" and as such I le items "suot-determined in compliance with the
waste gill until the are	a is decommissioned.
No violations noted du	ring this inspection
formal notification of any violations observed during the inspection.  either violations noted herein, or other violations identified as a result of This report does not constitute an order or other appealable deemed to grant or imply immunity from legal action for any violation is	of review of laboratory analyses or Department records.  action of the Department. Nothing contained herein shall be noted herein.  mply concurrence with the findings on this report, but does
Person interviewed (signature)	. Date
Inspector (signature) Allam AMul	Date June 1, 1995
	Page 5 of S

#### **INSPECTION REPORT - RESIDUAL WASTE LANDFILL**

Site Name FLAGG BRASS Operator Name Address 1020 W. HIGH Address Stowe, PA 19464  Municipality West Patts grove Two County  Responsible Official GARY LYMAN Title Environmental Evil  Person Interviewed Terry Stick Title Environ Mental  Inspector WM. Miler Time  Due Date Inspection Date Inspection Type Facility Type Inspector II  S1795 S1795 Ol 2132  Comment: Monthly Evaluation  Permit Expiration Date: Quarterly Groundwater Due Date: Days/Week Comments.	giveer Technician
Municipality West Patts grove Two County  Responsible Official GARY Lyman Title Environmental Enclosed Inspector Wm. M. Her Time  Due Date Inspection Date Inspection Type Solid Silving Silvi	giveer Technician
Municipality West Patts grove Two County  Responsible Official GARY Lyman Title Surrecumental Every  Person Interviewed Terry Stick Title Surrecumental Title Surrecumental  Inspector Wm. Miller Time  Due Date Inspection Date Inspection Type Facility Type Inspector II  5/17/95 5/17/95 0/ 0/ 2/32  Comment: Monthly Evaluation	TECHNICIAN
Responsible Official GARY LYMAN  Person Interviewed Jerry Stick  Inspector WM. M. Iler  Due Date Inspection Date Inspection Type  5/17/95 5/17/95 0/ 0/ 0/ 2/32  Comment: Monthly Evaluation	TECHNICIAN
Person Interviewed Jerry Stick  Inspector WM. Miler  Due Date Inspection Date Inspection Type  5/17/95  Comment: Monthly Evaluation  Title Znviron Mental  Time  Facility Type Inspector II  2/132	TECHNICIAN
Inspector WM. M. Her Time  Due Date Inspection Date Inspection Type Facility Type Inspector II  5/17/95 5/17/95 0/ 0/ 2/32  Comment: Monthly Evaluation	
Due Date Inspection Date Inspection Type Facility Type Inspector II  5/17/95 5/17/95 0/ 0/ 0/ 2/32  Comment: Monthly Euplustion	
Comment: Monthly Euplantion	D # Violation
Comment: Monthly Euplantion	
Permit Expiration Date . Days/Week (	
Quarterly Gloundwater Dut Dute Days week	Operated:
Repermit Date Annual Groundwater Due Date: Max. Daily Ve	olume:
1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Complia	ance
	HAPTER LINE TATION ITEM
Operation in accordance with approved plans and permit. 288.20	11(c)(2) R001
	11(c)(2) R002*
Disposal timing and sequence as per Section 288.112(1) 288.20	1(c)(2) R003*
	)1(d) R004*
XNo unapproved wastes.288.20XFacility's certification requirements followed.288.20	2 R005
Written Department approval of new construction prior to waste disposal. 288.20	)2(c) R006
Inspection of each load in accordance with approved waste analysis plan; analyses mantained for 5 years and available; notification of significant change in waste.	93(a)-(c) R007
DAILY OPERATIONS	
Site perimeter clearly marked and grid coordinate system in use; signs where required.	1(a)-(d) R008
Proper barriers installed and access controlled when attendant not present. 288.21	2(a)-(b) R009
Access roads designed, constructed and maintained in accordance with Chapter 105 and 288, and negotiable by collection vehicles.	13(a)-(k) R010
Approved means of measuring waste utilized. 288.21	(a), (b) R011
Adequate equipment on-site and stand-by equipment available. 288.21	15(a), (b) R012
Yehicles directed promptly to unloading area and promptly unloaded, (non captive facilities).	l6(c) R013
Solid waste spread and compacted into layers not exceeding two feet unless 288.21 otherwise approved.	R014
Working face size suitable for compaction and daily covering. 288.21	16(b) R015
No fugitive dust emissions, ambient air quality standards maintained. 288.21	17(a), (b) R016
X       Working face size suitable for compaction and daily covering.       288.21         X       No fugitive dust emissions, ambient air quality standards maintained.       288.21         X       No open burning.       288.21	17(c) R017*
	18(a), (b) R018
	19(a), (b) R019
Litter controlled/collected and barriers/fences in place. 288.22	

Site Name <u>FLAGG BRNSS</u>

ID Number <u>306852</u>

Date 5/17/95

### INSPECTION REPORT - RESIDUAL WASTE LANDFILL (Cont'd)

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

			1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-	Compliance	
STATUS 1   2   3   4		COVER/SLOPES/REVEGETATION	CHAPTER CITATION	ITEM	
	1		Top soil removed and stored in accordance with regulations.	288.231	R021
	11	1	Uniform daily cover applied as required.	288.232(a)	R022
			Daily/intermediate cover meets performance and design requirements.	288.232(c), (d) & 288.233(c), (d)	R023
			Minimum 5 day supply of daily and intermediate cover maintained on-site.	288.232(e) & 288.233(e)	R024
	П		Intermediate cover applied within time limits.	288.233(a)	R025
	$\prod$		Intermediate cover temporarily revegetated as required.	288.233(f)	R026
	X		Intermediate slopes covered, revegetated, and do not exceed 50%.	288.233(g)	R027
	i		Two foot compacted clay cap placed and graded over entire surface of final lift unless otherwise approved.	288.234(a)(1)	R028
	П		Drainage layer installed over cap as approved.	288.234(a)(2)	R029
	V	1	Uniform and compacted layer of soil placed over drainage layer.	288.234(a)(3)	R030
<b>Y</b>			Final cover meets performance and design requirement; applied within time limits.	288.234(c)-(e)	R031*
(			Final slopes stable and erosion controlled.	288.234(f), (g)	R032
<			Final slopes graded or terraced to 33% as approved.	288.234(g)(3)	R033
X			Extraction and removal of cover material meets regulations.	288.235	R034
X			Minimum revegetation and successful revegetation requirements adhered to.	288.236 & 288.237	R035*
			WATER QUALITY PROTECTION		
X			Surface and groundwater discharges prevented unless otherwise authorized by the Department.	288.241(a)-(c)	R036
X			Surface and groundwater treatment facilities properly operated and maintained.	288.241(b)	R037
×			Surface water percolation minimized/prevented.	288.242(b)(1) & 288.234(f)(4)	R038
X			Soil erosion and sedimentation controls as per approved plans; implemented(*) gullies over nine inches repaired.	288.242(a)(c)	R0391
<b>~</b>			Sedimentation ponds and discharge structures constructed, operated/maintained in accordance with Chapters 288, 102, and 105.	288.243(a)-(g) & 288.244	R0401
	X		Water supply replacement program in effect if required.	288.245(a)-(c)	R041
			WATER QUALITY MONITORING		
<			Approved monitoring system installed(*) and maintained.	288.251(a), (b)	R0421
X			Quarterly and annual monitoring requirements adhered to and results submitted to Department within time constraints.	288.254 & 288.255	R043
X			Groundwater assessment plan submitted and implement as required.	288.256(a)-(g)	R044
X			Groundwater abatement plan submitted and implemented as required.	288.257(a)-(h)	R045

Site Name	FLAGE BRASS
ID Number	300852
Date 5	17/95

#### INSPECTION REPORT - RESIDUAL WASTE LANDFILL (Cont'd)

11421 FC11011 1/F1	<b>•</b> · · · · · · · · · · · · · · · · · · ·		/ /
1-No Violation Observed	2-Not-Applicable	3-Not-Determined	4-Non-Compliance

	STA	TUS			CHAPTER	LINE
1	2		4	LINER SYSTEM	CITATION	ITEM
X				Liner system constructed(*), operated/maintained when required.	Class   288.431 Class    288.531 Class      288.624	R046*
X				Edge of liner requirements adhered to (i.e., no waste within 25 feet if adjacent liner or 15 feet if no adjacent liner, 4 feet high berm, and marked).	288.432(d)-(g) or 288.532(d)-(g)	R047
X				Leachate detection zone monitored weekly.	288.435(c)	R048
				Protective cover protects primary liner and leachate collection system and allows free flow of leachate into the collection system.	288.437(a) or 288.536(a)	R049
<				Protective cover meets minimum requirements and at least 18 inches thick.	288.437(b) or 288.436(b)	R050
Υ .				Leachate collection system within protective cover meets minimum requirements.	288.438 or 288.537	R051
′				Barrier designed, constructed and maintained as required to prevent lateral migration of leachate off-site in surface mined areas.	288.439 or 288.538	R052
×				8 feet of select waste placed over protective cover.	288.440	R053
				LEACHATE TREATMENT		
 ×				Leachate collected and handled through Department approved method(s).	288.452 or 288.552	R054
	Х			Leachate transportation requirements adhered to.	288.453(a)-(c) or 288.553(a)-(c)	R055
X				Cessation of site operation if alternate leachate handling not available.	288.453(d) or 288.553(d)	R056
X				Leachate recirculation in accordance with regulations.	288.454 or 288.554	R057
<				Leachate collection and storage systems on-site have capacity of 30 days or 250,000 gallons, whichever is greater. No more than 25 percent of total storage capacity used for flow equalization on a regular basis.	288.455 or 288.555	R058
ζ				Leachate flow rate measured daily; analyzed quarterly.	288.456 or 288.556	R059
`				Department notified when remedial action(s) required.	288.457 or 288.557 or 288.625	R060
				RECORDKEEPING AND REPORTING		
<				Operational records maintained, available and submitted as required.	288.258 and 288.281-288.283	R061
				MINERALS AND GAS		
	X			25 foot isolation maintained from coal formations and mine openings sealed in approved manner.	288.261(a), (b)	R062
	X			Subsidence plan implemented as approved.	288.261(c)	R063
	X			Gas venting and monitoring in accordance with approved plans.	288.262(a)-(d)	R064
1				Combustible gas levels not exceeded.	288.262(e)	R065
<				Forced gas venting if required.	288.262(f)	R066
X				Gas recovery conducted as per approved plan and §288.161, including annual analysis.	288.263(a), (b)	R067

Site Name	FLAGE BRASS
ID Number	300852
Date	117/95

#### INSPECTION REPORT - RESIDUAL WASTE LANDFILL (Cont'd)

3-Not-Determined 2-Not-Applicable 4-Non-Compliance 1-No Violation Observed LINE CHAPTER **STATUS EMERGENCY PROCEDURES** CITATION ITEM 2 | 3 | 4 288.271(b) **R068** First aid facilities available; safety practiced. Emergency equipment available and maintained. 288.272(a)-(d) R069 288.273(a)-(c) Contingency plan implemented when appropriate. **R070 SPECIAL HANDLING WASTES** PCB waste accepted with prior Department approval, and in accordance with 288.301(a)-(d) R071 permit and Toxic Substance Control Act. 288.302 R072 Friable aspestos disposal restrictions adhered to. 288.303 R073 Other special handling waste disposal restrictions adhered to. **BONDING AND INSURANCE REQUIREMENTS** 287.312(a) R074 Bond filed with Department. 287.333 R075\* Bond maintained in an amount and with guarantees as required. Bond amount \$ 50,000 Phased deposit due date \_\_\_\_\_ Proof of a commercial policy of liability insurance submitted to the 287.373(a)(b) R076 Department as specified by 287.373 (Proof insurance coverage) Policy No.: 590 5838 Expiration Date: March 1996 Insurer (Company Name): MARSH & McClenna R077 Insurance coverage maintained continuously in full force until final closure 287.375(a) certification. INTERIM OPERATING REQUIREMENTS UNPERMITTED FACILITIES (UNTIL PERMITTED) **R078** 287.114(c)(1) No new wastes after July 4, 1992. 287.114(c)(2) No new areas for disposal after July 4, 1992. R079 R081 No expansion of capacity after July 4, 1992. 287.114(c)(4) No increase in average daily volume of waste after July 4, 1992. 287.114(c)(5) R082 PERMITTED FACILITIES (until repermitted after July 4, 1992). R083 No disposal on areas not authorized by permit prior to July 4, 1992. 287.116(c)(1) No increase in average daily volume beyond that which existed as of July 4, 287.116(c)(3) R085 1992 (unless authorized in writing from the Department.)



ER-WM-129: Rev. 12/93

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

#### **INSPECTION REPORT COMMENTS**

Date of Inspection 5 17 95	Identification Number <u>300分に</u>
Company/Facility/Site Name FLAGE BRASS	STUNE, PA West Pottsgrave Tup
Onsite to conduct a mo Captive Residual Waste &	nthly evaluation of this
has received wastes only	re day thus far in the
As a result the condition	to the operational records
not changed markedly	· Terry Stick Klagg's
Environmental technician to inspect the landfil	and accompanied me
throughout the walnut spection I noted one Sect	A ATTACK
and needs to be resected notable to report.	ures. Nothing else
V	using the importance
Ni violations noted d	June instruction
This inspection report is notice of the findings of an inspection	conducted by a representative of the Department. This report is
formal notification of any violations observed during the inspection either violations noted herein, or other violations identified as a result. This report does not constitute an order or other appealable deemed to grant or imply immunity from legal action for any violation.	. Additional notification of violations may be issued concerning of review of laboratory analyses or Department records. e action of the Department. Nothing contained herein shall be noted herein.
Signature by the person interviewed does not necessarily acknowledge that the person was shown the report or that a copy was	imply concurrence with the findings on this report, but does left with the person.
Person interviewed (signature) fung. Stud	Date 5/17/45
Inspector (signature) William of Willi	Date 5/1/95  Page <b>5</b> of 5

Page 1 of 5

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#### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES **BUREAU OF WASTE MANAGEMENT**

#### HAZARDOUS WASTE INSPECTION REPORT **GENERATORS - PART A**

Date of I	nspection	29 94 1	ime start	Time finish _					
Name of Inspector Carol Sharp									
		name Stanle	, Flagg	f flaga	Brass)				
Location	1020	w. High	Street						
County_	MONT	Jomeny 0	Municipality	W. Potts	prove				
	ition number_		1737899		O				
Name of	responsible of	ficial MIKE	Cookmai	J					
Title	PLE	Sident							
Mailing A	Address								
Area cod	e and telepho	ne number (610)	<u> 326-90</u>	$\infty$					
		ewed Conrad							
Title	Chief	Plant &	Daines						
Mailing a	ddress (if diffe	erent from above)							
Area code	e and telephor	ne number							
1. Curr	ent waste har	ndling method:							
a.		•	storage,	☐ disposal	□PBR				
b	. On-site	use,	reuse,	□ recycle,	☐ reclaim				
<b>c</b> .	☐ Off-site	☐ treatment,	☐ storage,	☐ disposal					
d	. Off-site	use,	reuse,	recycle,	☐ reclaim				
2. Amo	ount of hazard	lous waste produced:	_	follow-	up inspection luations				
		,	kg./mo./ —	o PRR eva	luations				
b			kg/yr.	5/3/94	(10)				
				• `					
	es of hazardo tion and type)	ous waste produced by	Mazardous Waste	Number and destination	on facility (include				
Wast	e Number	Destination	Facility	Location an	d Type				
	/			<u> </u>					
	/								
<del></del>	/								
[		1							

Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

### Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Waste Management

#### **Inspection Report Comments**

Date of Inspection	6-29-94		Identification Number	PADO01737899
Company/Facility/Site Nam	ne Stroley	Flagg		
Joinputty// Jointy/Otto		J S		

This inspection was conducted as a follow-up to my 2-7-94, 4-13-94, and 5-3-94 inspections in which a total of 6 violations were observed. Several items which were marked "Not Determined" were reevaluated during this inspection and a few important suggestions were also made in order to assist the facility in avoiding noncompliance. I was joined during the inspection by Conrad Heimbach.

The violations cited in the previous inspections mentioned above included:

- Run-on into the 'moondust' hazardous waste containment area; Section 265.178.
- through 4. Unmanifested shipments of hazardous waste to an unpermitted TSD facility; Sections 262.13(a), 262.20, 262.33.
- Lack of a 24 hour surveillance for the Permit by Rule facility; Section 264.14(b)(1).
- Lack of proper signs on the treatment plant processes;
   Section 264.14(c).

Steps that have been taken to resolve these violations:

1. It could not be determined whether run-on into the hazardous waste containment area had been prevented. No run-on was observed at the time of inspection. Mr. Heimbach indicated that Gary Lyman was in the process of preparing a closure plan for the moondust shed and the sphincter cone, however Mr. Lyman was not available to discuss the status of the closure plan.

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Person Interviewed (signature)	Date	3/12/94
Inspector (signature) Carol Sharp	Date	8/4/94
		Page _2_ of _5_

### Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Waste Management

#### **Inspection Report Comments**

Date of Inspection 6/	29/94	Identification Number	PADO01737899
Company/Facility/Site Name	Stanley Flagg		
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- 2. through 4. I was advised that Flagg does not ship any of their hazardous wastes to St. Joe's Zinc America but that they do send their ash to St. Joe's. Whether a hazardous waste determination has been performed on this ash was not determined at the time of this inspection and will be evaluated at a later date.
- 5. Twenty-four hour surveillance of the active portion of the treatment facility is being achieved through the use of cameras at each access gate to the facility. A guard is responsible for viewing the monitoring screens. Compliance with Section 264.14(b)(1) has apparently been maintained.
- 6. Signs were observed at each active portion of the treatment plant. Compliance with Section 264.14(c) has been acquired.

One additional violation was observed:

Discussed during the 5-3-94 inspection was Flagg's unpermitted accumulation of hazardoùs waste in a pile located in the HW storage shed. The storage of hazardous waste in a pile without a permit is a violation of Section 262.34 (a)(2). While this issue was discussed with Mr. Heimbach during the 5-3-94 site inspection, it was inadvertently left out of my inspection report comments. Nonetheless, this is a violation, therefore Flagg should cease accumulating waste in the storage shed pile and begin storing it in a container and/or tank within 15 days of receipt of this inspection report.

Other observations and recommendations:

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Person Indiana (signature)	Date _	2/12/96
Inspector (signature) and Sharp	Date	8/4/94
		Page 2 of 5

### Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Wasta Management

#### **Inspection Report Comments**

Date of Inspection	129/94		Identification Number	PADCO1737879
Company/Facility/Site Nam	stanke			
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It was recommended during the 5-3-94 inspection, and in a June 13, 1994 letter from Bob France, Waste Management Supervisor, that a chemical analysis of the wastewater treatment plant's filter cake be provided to the Department. To date, no results have been received by the Department. The results of this analysis should be forwarded as soon as possible.

A review of hazardous waste manifests revealed that volume discrepancies are still occurring in Flagg's shipments of waste. Manifest number PAE0810051 indicates that 6000 gallons of hazardous waste oil were shipped to Booth Oil located in New York. However, Booth Oil indicated on the manifest that only 1944 gallons were received, a discrepancy of 4056 gallons. An explanation for this discrepancy is requested. Please submit in writing to the Department within 30 days, an explanation for the above mentioned hazardous waste manifest discrepancy. Include an accounting for the waste that was indicated as being shipped but not received by the disposal facility.

Previously "Not Determined" items:

a. Record of inspections of equipment. The treatment plant operator had been keeping a Waste Water Treatment Plant Daily Log (copy attached) which indicates what equipment is inspected and what type of maintenance had been performed. I was informed during the inspection that the treatment plant operator had recently retired, therefore the new treatment plant operator should continue keeping these Daily Logs. During the inspection I observed that a large amount of liquid had become puddled on the floor by one of the treatment plant tanks. The cause of this leak and the steps taken to correct and clean it up should be included in the Daily Log for this date.

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Person lateral (signature)	Date	2/12/94
Inspector (signature) (and Sharper)	Date	8/4/94
		Page 4 of 5

ER-WM-129: Rev. 12/88

### Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Waste Management

#### **Inspection Report Comments**

Date of Inspection	129/94		Identification Number	PADOC1737879
Company/Facility/Site Name	Stan Ou	Elaga		
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b. Use of an up-to-date PPC Plan. Stanley Flagg's PPC plan appeared to be current in it's list of emergency coordinators and phone numbers although the plan was last updated in 1992. The PPC plan did not specifically address the method of managing spills in the treatment plant, but instead included a general management plan. With the recent changes in the facility's processes and staff, it is recommended that this PPC plan be reviewed to ensure that it is up-to-date and accurate.

In conclusion, two violations have been corrected, compliance with three violations could not be determined, one additional violation was observed which should be addressed and corrected, and after being provided with the necessary information I was able to determine that the facility was in compliance relative to a previously noted violation involving twenty-four hour surveillance.

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Person Interviousat (signature)	Ten of La	Date 3/4/99
Inspector (signature)	Carot Shay	Date 8-4-91
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## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection $\frac{4/l}{l}$	3 \$ 5/3/94	Time start	Time finish	1
Name of Inspector	'anol Sh	arp	7.5	
Company, installation n			aga (Flago	Brass)
Location (020	W. High	Street, S	Stowe, PA	19464
county Monta	omeny		ry W. Pott	sgrave
Identification number_		173789		<u> </u>
Name of responsible of	ficial_Thome	<u>s, Jacob</u>	· <b>S</b>	
Title •	Preside	<u>'n+</u>		
Mailing Address				
Area code and telephon				
Name of person intervie	ewed Jerry	Stick :	Conrad His	mbach
Title Env. Te	chnician	, Chiet'	Plant Engi	neer
Mailing address (if diffe	rent from above)		<u> </u>	
Area code and telephon	e number			
Current waste hand	dling method:			
a. 🗓 On-site	☐ treatment,	☐ storage,	☐ disposal	<b>□</b> PBR
b. 🔲 On-site	use,	reuse,	recycle,	☐ reclaim
ک: Off-site	treatment,	storage,	<b>✓</b> disposal	
d. 🖸 Off-site	☐ use,	🗌 reuse,	recycle,	reclaim
2. Amount of hazard	ous waste produced:		Part B evo	<i>eluation</i>
a. <u>&gt; 1,0</u>	•	kg./mo.	conducted	2-7-94:
			This insper	
•				only
<ol><li>Types of hazardor location and type).</li></ol>		by Hazardous Wast	te Number and destina	ition facility (include
5.0			· •	
Waste Number	Destinati	on Facility	Location	and Type
Door		·		
Doog				
PEQT,1000				
DO18, FOO!				
PAOI				

Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

Page 1 of 7

#### PERHIT BY RULE REQUIREMENTS

Title 25 Chapter 265 Subchapter 433 1 - no violation obser

2 - not applicable

3 - not determined 4 noncompliance

Chapter Citation 264	Requirements	Compilance 1 2			) Status J 4	
.14(b)(1)	Active portion has 24 hour surveillance.		T	1	1>	
.14(b)(2)	Fence surrounds antire plant Artificial barrier surrounds active portion.	X				
.14(c)	Proper signs are posted.				$\supset$	
15(b)(1)	Inspection schedule is on-site.	$\perp$		X		
	Inspections are conducted as per inspection plan.	1_	<u> </u>	X		
.15(d)	Deterioration and/or malfunctions of equipment corrected as revealed by inspections.			X		
.15(d)	Immediate remedial action taken when a hezard is imminent or already present.	$oldsymbol{ol}}}}}}}}}}}}}}}}}$	X			
.15(e)	Inspection log is maintained and utilized properly.			X	estation -	
22(1)	Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	X				
.32(2)	Facility is capable of summoning outside emergency assistance.	X				
.32(3)	Facility is equipped with spill and decontamination control equipment.	X				
.30	Facility communications and/or alarm systems and spill and decontamination control equipment is periodically tested and maintained.			X		
.15	Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment.	X				
	A copy of the PPC plan and all revisions to the plan is available at the facility.			X		
.\$2(d)	The contingency plan centains an up-te-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.			X	£;	
	One employee is designated as the primary emergency coordinator and is either on-site or on call at all times.	$\times$				
73(a)	Operating records are maintained at the facility.		$\rangle$			
73(b)(1)	Description and quantities of wastes treated and discharged under FSR.				_	
.73(b)(3)	lesuits of weste analyses and trial tests performed under 265.13.	1	4	$\perp$		
	numbery reports and details of any incidents requiring implementation of the		$\rightarrow$			
.11[a]	Facility has an identification number [PAD#]	$\langle$				

### PERMIT BY RULE REQUIREMENTS (Continued)

1 - no violation observed

2 - not applicable

3 - not determined

noncompliance

Chapter Citation 264	Requirements	Cod	plia 2	nce St	atus
.73(b)(5)	Results of all en-site inspections, including those outlined in below.			X	
56(j); 73(b)(4) 77(a)	Emissions, discharges, fires, explosions and groundwater contamination reported to the Department as required.			X	
.75[b)[e)	Quarterly reports submitted			$\times$	
177 17(a)(b)	Special precautions are taken to prevent accidental ignition or reaction of hazardous wastes.		X		
CHAPTER 265 401 (b)	Hazardous waste or treatment reagents are not placed in a treatment process or equipment if they could cause it to rupture, leak, corrode or otherwise fail.	X			
401(c)	Continuously fed equipment is fitted with a means of stopping the inflow.	$\times$			
402	When facility treats a waste which is substantially different from previously treated wastes, the owner or operator shall:	,	,		
	Conduct waste analyses and trial treatment tests or substitute written documentation to show that the proposed process will not cause ignition, reaction, or dasage to equipment.		X		
4030)	The following minimum inspections are performed			X	
403 (2)	Discharge control and safety equipment at least once each operating day.  Data from process monitoring equipment at least once each operating day to ensure proper operation.	X			7
403 (3)	Construction meterials o the treetment process and equipment at least once weekly to detect corresion or leaks.			X	
	Construction materials of discharge containment structures and immediate purrounding area at least weekly to detect erosion or leaking.			X	
		$\perp$		$\perp$	1
433(2)	facility has an NPDES permit or discharges to a POTW	$\langle  $			-
		+	$\top$	$\top$	†

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Page 3 of 7

#### Commonwealth of Pennsylvenia Department of Environmental Recourses Environ of Waste Management

#### Inspection Report Comments

Date of Inspection	4/1	3/94	151	13/94	Identification Number	PADO	1737899
Company/Facility/Site	Name .	Sta	nley	F/a19	(Flagg R	CASS)	
• •			/	0 /	Uð	_	

In order to evaluate Stanley Flagg's compliance with the Department's Hazardous waste Permit by Rule requirements, two inspections were conducted. On April 13, 1994 a joint inspection with the Bureau of Water Quality was performed at the facility's waste water treatment plant, and on May 3, 1994 another inspection was conducted of the facility's treatment plant and sphincter cone unit. The results of both of these inspections are concluded below.

On August 22, 1984 Stanley Flagg was granted approval for operation of a hazardous waste permit by rule facility for the treatment of their aqueous hazardous waste under N.P.D.E.S. permit # PA0050903. This approval included the use of the sphincter cone and industrial wastewater treatment plant.

Sphincter Cone: Wastewater from the brass operation passed through the sphincter cone in order to collect and concentrate solids, while the remaining water was collected in a pit which lead to a small cement impoundment, then in turn lead to the treatment plant. The wastewater that was passed through the cone was generated from a wet air filtering process which was replaced by a dry mill system sometime during the summer of 1988. At the time of the inspection, the sphincter cone unit was observed to still be in place with it's associated water collection pit and concrete impoundment. The collection pit was observed to still contain some liquids and solids. This unit and any associated equipment which may have come in contact with hazardous waste should be properly decontaminated and/or closed as per Section 265.404 of the Department's Hazardous Waste Management

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deemed to grant or imply immunity from legal action for any violation noted herein.

Person Interviewed (signature)	Conrad L. Heimbach	Date 4/21/94
Inspector (signature)	Carol Sharp	Octo 5-17-94
		Page 4 d 7

#### Commonwealth of Pennsylvania Department of Environmental Resources Russes of Wasta Massachuset

#### Inspection Report Comments

Oate of Inspection $\frac{4/13/94}{8}$	5/3/94	Identification Number	PAD0017	37899
Company/Facility/Site NameState	neu Flagg	(F/agg 1	BRASS)	
Companyis acarellosse seams	03	00		

Regulations. All hazardous waste and hazardous waste residues should be removed from the treatment process equipment, discharge control equipment, and discharge confinement structures.

Wastewater treatment plant: The wastewater treatment plant was put into operation in 1983/1984 as part of a Bureau of Water Quality Consent Order of Agreement. As best as can be determined, the hazardous wastes that historically entered into the treatment plant consisted of the following:

- Sphincter cone effluent,
- 2. Iron galvanizing waste waters (containing Cadmium and Lead),
- galvanizing lagoon waters which were pumped out of the lagoons and into the treatment plant in 1984.

Additional hazardous wastes that are still being treated at the plant include the following:

- 4. Contaminated water from the groundwater recovery well used to collect the plume created from the use of unlined galvanizing lagoons,
- 5. Leachate from the passage of stormwater through the hazardous waste storage pile,
- 6. Acid batches from the galvanizing process (although the galvanizing process was shut down in 1993, acids were observed during the April 13 inspection to still be going into the wastewater treatment plant's equalization basin).
- 7. Leachate from the residual waste landfill. The landfill apparently at one time received several loads of

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Person Interviewed (signeture)	Oets
Inspector (signature) Carol Sharp	Date 5-17-94
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#### Commonwealth of Pennsylvania Department of Environmental Resources Serves of Wests Massacrast

#### Inspection Report Comments

Date of Inspection		13/94 \$ 5		Identification Number	_PADO	01737899
Company/Facility/Site	-	Stanley	Flagg	(Flagg	Brass,	

hazardous waste from their foundry, and presently receives sludges from the wastewater treatment plant.

Stanley Flagg should perform a hazardous waste determination on the sludges that are collected in the treatment plant and disposed of in the onsite landfill. A form U (Request to Process or Dispose of Residual Waste) may be used for reporting the results of the analysis and will serve the dual purpose of meeting the requirements of Section 287.115 of the Residual Waste Management Regulations (related to filing of permitted residual waste facilities). A form U has been provided along with this inspection report. Any questions you may have on completing this form should be directed to Larry Lunsk, Waste Management Facility Manager at 832-6213.

Several items on this inspection report are marked as 'Not Determined'. Compliance with these requirements could not be determined due to the fact the treatment plant operator was off during the day of the inspection. The items that could not be determined include the following:

a. A record of inspections conducted for the purpose of identifying and correction malfunction and deterioration, operator errors and discharges. Inspections of monitoring equipment, safety and emergency equipment, security devices, and areas subject to spills. These inspections are required to be recorded in a log which includes the date of inspection, observations made, and the date and nature of any repairs or remediation. While the security guard in the guard shack does keep a record of the

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Person Interviewed (signeture)			Date
Inspector (signature)	and	Sharp	Date 5-17-94
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ER-WM-128: Rev. 12/68

#### Commonwealth of Passeylvania Department of Environmental Recovers Sures of Waste Masseyment

#### Inspection Report Comments

 Date of Inspection	4/13	194 \$ 5/3	3/94	Identification Number	PADOO	1737899
Company/Facility/Site	Name	Stanley		(F/999)	Rrass)	
,	_	)	00	00		

process equipment alarms that are sounded, as well as who was then paged to handle the problem, the record does not include the date and nature of any repairs.

- b. An updated PPC plan with all revisions,
- c. An operating record with a description and quantity of each hazardous waste treated and method of treatment. A quarterly report may be used to record this information.

The above 'Not Determined' items will be evaluated in a follow up inspection.

In conclusion, two violations of the Permit by Rule requirements were observed. Section 264.14(b)(1) requires the active portion of the facility to have 24 hour surveillance. During the inspection it was observed that the treatment plant was unattended by an operator and no other method of monitoring or controlling unauthorized access to the facility was in place. Section 264.14(c) requires the active portions of the facility to be posted with signs with the legend "Danger-Unauthorized Personnel Keep Out" or the equivalent. While a sign was observed at the main entranceway to the facility, the rear accessway and the equalization basin do not contain warning signs. These two violations should be addressed and corrected, and a closure plan for the sphincter unit should be developed.

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Person Interviewed (signeture)	Cete
Inspector (signature) Carol Shap	Date 5-17-94
	Page 17 at 7